

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

**IN RE: ANGELA MONIQUE BROWN**

**CASE NO.:18-02900-NPO  
CHAPTER 13**

**OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

COMES NOW, Rushmore Loan Management as servicer for U.S. Bank, National Association as Legal Title Trustee for Truman 2013 SC4 Title Trust (hereinafter “Creditor”) and files this Objection to Confirmation of Plan, and in support thereof would show the following:

1. Creditor is the assignee of a Deed of Trust, signed by Debtor, which was recorded in Book 2211 at Page 580 in the office of the Chancery Clerk of Lauderdale County, Mississippi.
2. The property at issue in this case is located at 3016 40th Ave, Meridian, MS 39307.
3. The Plan (Dk# 2) filed by the Debtor lists Creditor as a home mortgage secured claimant, but the Plan incorrectly reflects the amount of arrearage due on the loan associated with the above referenced Deed of Trust.
4. Creditor is due ongoing mortgage payments, as well as arrearage payments, which will be listed more specifically in the Proof of Claim to be filed in this bankruptcy case.
5. Creditor is a secured creditor, and cannot adequately protect its rights under the terms of the Plan (Dk# 2) filed by the Debtor.
6. For good and valid reasons to be shown at the hearing on this Objection to Confirmation of Plan.

WHEREFORE, PREMISES CONSIDERED, Creditor, respectfully requests confirmation of the Plan (Dk# 2) filed by the Debtor be denied.

Respectfully submitted, this 10th day of September 2018.

Dean Morris, LLC  
2309 Oliver Road  
Monroe, LA 71201  
(318) 330-9020

**/s/ Elizabeth Crowell**  
Elizabeth Crowell (Bar# 103676)  
elizabeth.crowell@ms.creditorlawyers.com  
ATTORNEY FOR MOVANT

**CERTIFICATE OF SERVICE**

I, Elizabeth Crowell, hereby certify that I have notified all interested parties of the  
Objection to Confirmation of Chapter 13 Plan filed by Creditor, who are listed as follows:

Angela Monique Brown  
3016 40th Ave  
Meridian, MS 39307

Thomas Carl Rollins, Jr  
Attorney at Law  
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J. C. Bell T1  
Trustee  
mdg@jcbell.net

Office of U.S. Trustee  
USTPRegion05.JA.ECF@usdoj.gov

by electronic transmission or by mailing a copy of the Objection to Confirmation to Chapter 13 Plan  
filed herein by United States Mail, first class, postage prepaid and properly addressed, all on this  
10th day of September 2018.

Dean Morris, LLC  
2309 Oliver Road  
Monroe, LA 71201  
(318) 330-9020

**/s/ Elizabeth Crowell**  
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